

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF WISCONSIN

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MARISSA DARLINGH

Plaintiff,

Case No. 22-CV-1355

v.

ADRIA MADDALENI, et al.,

Defendants.

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**DECLARATION OF LUKE BERG**

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I, Luke Berg, declare that, if called upon, I could and would competently testify to the following:

1. I am an attorney for the Plaintiff in the above-captioned case. I submit this declaration in connection with Plaintiff's motion for a Preliminary Injunction.

2. Exhibit 1 to this Declaration is a true and correct copy of the Milwaukee Public School District's Employee Handbook.

3. Exhibit 2 to this Declaration is a true and correct copy of the letter DPI sent to Ms. Darlingh on April 29, 2022.

4. Exhibit 3 to this Declaration is a true and correct copy of the letter given to Ms. Darlingh by her supervisor on June 9, 2022.

5. Exhibit 4 to this Declaration is a true and correct copy of an email chain on June 13, 2022, regarding the June 15, 2022, misconduct hearing.

6. Exhibit 5 to this Declaration is a true and correct copy of an email sent to Ms. Darlingh by Ms. Freiberg on June 13, 2022, directing her not to report to work the following day.

7. Exhibit 6 to this Declaration is a true and correct copy of a letter sent to Ms. Darlingh on June 14, 2022.

8. Exhibit 7 to this Declaration is a true and correct copy of the no-trespassing order sent to Ms. Darlingh on June 14, 2022.

9. Exhibit 8 to this Declaration is a true and correct copy of the “packet” sent to Ms. Darlingh shortly before the misconduct hearing on June 15, 2022.

10. Exhibit 9 to this Declaration is a true and correct copy of Ms. Darlingh’s written response to the first misconduct letter that she submitted on June 27, 2022.

11. Exhibit 10 to this Declaration is a true and correct copy of an email chain between Jun 16, 2022, and June 30, 2022, regarding scheduling of the “emergency misconduct conference,” pertaining to the second misconduct letter.

12. Exhibit 11 to this Declaration is a true and correct copy of an email chain between August 25, 2022, and September 20, 2022, regarding scheduling of the “emergency misconduct conference” pertaining to the second misconduct letter.

13. Exhibit 12 to this Declaration is a true and correct copy of the termination letter sent to Ms. Darlingh on September 30, 2022.

14. Exhibit 13 to this Declaration is a true and correct copy of the Milwaukee Public School District’s Administrative Policy 6.04 entitled “Employee Code of Ethics.”

15. Exhibit 14 to this Declaration is a true and correct copy of an email chain between July 27, 2022, and July 28, 2022, regarding voting for the August 9 primary.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on December 13, 2022

  
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Luke N. Berg